

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. 03-60

REQUEST: Joint Parties Information Requests to AT&T Communications of New England, Inc.

DATE: December 24, 2003

JOINT PARTIES-
ATT-1: Please state whether you are either an incumbent local exchange provider (“ILEC”) providing telecommunications service in the Massachusetts or an affiliate of such an ILEC. If you are an affiliate of an ILEC, please identify the ILEC and describe the affiliation. For purposes of these Requests, “affiliate” shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term “affiliate” as “a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term ‘own’ means to own an equity interest (or the equivalent thereof) of more than 10 percent.” 47 U.S.C. §153(1)

Respondent: Patricia Jacobs

RESPONSE: AT&T Communications of New England, Inc. (“AT&T”) is neither an ILEC nor an affiliate of an ILEC.

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JOINT PARTIES-
ATT-2: Please state whether you are either a competitive local exchange carrier ("CLEC") providing telecommunications service in Massachusetts or an affiliate of such a CLEC. If you are an affiliate of an CLEC, please identify the CLEC and describe the affiliation. For purposes of these Requests, "affiliate" shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term 'own' means to own an equity interest (or the equivalent thereof) of more than 10 percent." 47 U.S.C. § 153(1)

Respondent: Patricia Jacobs

RESPONSE: AT&T is certified to provide competitive local exchange services in Massachusetts.

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JOINT PARTIES-ATT-3: Do you lease analog voice-grade loops from Verizon to provide local exchange service in Massachusetts? (For purposes of this question, please do not include any DS-0 or voice grade circuits that are part of a T1 circuit or a DS1 or above circuit.)

Respondent: Pamela Brander

RESPONSE: Yes.

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JOINT PARTIES-
ATT-4: Do you use non-ILEC switches to provide local exchange service to Massachusetts customers via analog voice-grade loops? (For purposes of this question, please do not include any DS-0 or voice grade switched circuits that are part of a T1 circuit or a DS-1 or above circuit.)

Respondent: Pamela Brander

RESPONSE: AT&T does use its own switches to provide limited business local exchange services, via analog voice-grade loops, in Massachusetts.

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JOINT PARTIES-
ATT-5: To the extent that you have not already provided this information in response to the Department's Information Requests, please provide the following information for each switch owned by you that you use to provide local exchange service to Massachusetts customers

a. the 8-digit common language location identifier ("CLLI") code as it appears in the Local Exchange Routing Guide ("LERG");

b. street address, city and zip code;

c. currently equipped line side capacity in

i. DS-0/voice grade circuits and

ii. DS-1 circuits;

d. currently utilized line side capacity in

i. DS-0/voice grade circuits and

ii. DS-1 circuits;

e. current switch processor capacity in CCS;

f. busy hour and busy season utilized switch processor capacity in CCS;

g. function of the switch (e.g., stand-alone, host, or remote, other [e.g. DLC node with no intelligence and/or no or limited switching capability]).

Respondent: Pamela Brander

RESPONSE:

For the information sought by parts (a), (b), and (g) of this request, please see AT&T's response to the Department's October 9, 2003 information request DTE-ATT-14. Please further note that the four switches that were identified in this response as providing local service but whose functions were not listed are all stand-alone switches.

c, d, e, and f. AT&T is continuing to investigate to determine whether information responsive to these information requests is available in the form requested.

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JOINT PARTIES-
ATT-6: Please provide the following general information regarding any local exchange service that you currently offer to customers in Massachusetts using analog voice grade loops served by a non-ILEC switch (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits).

a. Do you currently provide local exchange service to residential customers in Massachusetts using analog voice-grade loops served by a non-ILEC switch? If so, are you currently advertising this service? Are you currently marketing this service? Please explain [e.g. broadcast or print advertising, telemarketing, direct mail, Internet, etc.].

b. Do you currently provide local exchange service to business customers in Massachusetts using analog voice-grade loops served by a non-ILEC switch? If so, are you currently advertising this service? Are you currently marketing this service? Please explain.

c. Please provide a description of each of the residential and/or business local exchange products that you currently provide to Massachusetts customers using analog voice grade, non T-1 loops. You may choose to respond by completing the following matrix.

Product Name	Available to Res. Customers ?	Available to Bus. Customers ?	Retail Price?	Bundled with LD or DSL Service?	Available as Standalone Local Product?	Currently Advertising?	Currently Marketing?
[Name of product]	[Yes/No]	[Yes/No]	[\$X.X X]	[Yes/No]	[Yes/No]	[Yes/No]	[Yes/No]

Respondent: Catherine Montfort

RESPONSE:

a. AT&T does not use non-ILEC switches to provide local exchange service to residential customers in Massachusetts.

b. AT&T uses its own switches to provide local exchange service in Massachusetts over analog voice-grade loops to business customers, primarily to small business mass market customers.

AT&T Business Services primarily uses two marketing methods for its business mass market offering: direct telemarketing and direct marketing (“feet on the street”). These functions are primarily provided through contracts with independent firms using material developed by the AT&T Business Services product team.

c. AT&T’s offering to business mass market customers is its All-in-One product. As described above, AT&T does market the All-in-One product in Massachusetts. Information about AT&T Business Services products may be obtained at <http://www.serviceguide.att.com/ABS/ext/index.cfm>

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REQUEST: Joint Parties Information Requests to AT&T Communications of New England, Inc.

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JOINT PARTIES-
ATT-7: If you offer cable telephony service in Massachusetts, please state:

a. To what percent of your cable telephony customers do you provide standalone local exchange service (i.e. no broadband, no cable television)? What is the typical or average retail price for this service?

b. To what percent of your cable telephony customers do you provide local exchange service and broadband service but not cable television service? What is the typical or average retail price for this service?

c. To what percent of your cable telephony customers do you provide local exchange service and cable television service but not broadband service? What is the typical or average price for this service?

d. To what percent of your cable telephony customers do you provide local exchange service, cable television service, and broadband service? What is the typical or average price for this service?

Respondent: Pamela Brander

RESPONSE: AT&T does not offer cable telephony service in Massachusetts.

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JOINT PARTIES-
ATT-8: If you are a CLEC offering circuit-switched local exchange service in Massachusetts, for each month or quarter over the most recent 12-month period for which data is available, please provide the following for each Verizon wire center in which you offer service (if the data is available), for each CLEC switch through which you offer service (identifying switches by CLLI code), and on a statewide basis:

- a. The number of newly installed business lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits);
 - i. Number or percentage of such lines that were migrated from the ILEC's retail service.
 - ii. Number or percentage of such lines that were migrated from a CLEC's retail service.
- b. The number of newly installed business lines served by UNE-P;
 - i. Number or percentage of such lines that were migrated from the ILEC's retail service.
 - ii. Number or percentage of such lines that were migrated from a CLEC's retail service.
- c. The number of newly installed residential lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits);
 - i. Number or percentage of such lines that were migrated from the ILEC's retail service.
 - ii. Number or percentage of such lines that were migrated from a

CLEC's retail service.

d. The number of newly installed residential lines served by UNE-P.

i. Number or percentage of such lines that were migrated from the ILEC's retail service.

ii. Number or percentage of such lines that were migrated from a CLEC's retail service.

For lines migrated from a CLEC's retail service, please separately disaggregate whether those customers were migrated from a UNE-L or UNE-P service delivery mechanism. If you are unable to provide information responsive to all three geographies, please provide responsive information to the extent it is available. Please do not include T-1 circuits or loops served via DS1 or above level facilities in your response.

Respondent: Keith Snyder

RESPONSE:

a. AT&T is continuing to investigate to determine whether information responsive to this request is available in the form requested.

b. AT&T is continuing to investigate to determine whether information responsive to this request is available in the form requested.

c. AT&T does not offer residential UNE-L service in Massachusetts.

d. AT&T began to offer residential UNE-P service in Massachusetts less than 9 months ago; all of AT&T's residential UNE-P lines are therefore newly installed.

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JOINT PARTIES-
ATT-9: Please provide, for the most recently available point in time (specifying what it is), and for each Verizon wire center in which you offer service (if the data is available), for each CLEC switch through which you offer service (identifying switches by CLLI code), and on a statewide basis, the number for your company of:

a. Installed business lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits) served by circuit switches;

b. Installed business lines served by UNE-P;

c. Installed business lines served by non-circuit switches;

d. Installed residential lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits) served by circuit switches

e. Installed residential lines served by UNE-P;

f. Installed residential lines served by non-circuit switches.

If you are unable to provide information responsive to all three geographies, please provide responsive information to the extent it is available. Please do not include T-1 circuits or loops served via DS1 or above level facilities in your response.

Respondent: Catherine Montfort, Keith Snyder

RESPONSE: a. The majority of business lines that AT&T switches serve over unbundled analog voice-grade loops in Massachusetts are served to customers of AT&T's All-in-One product, which is AT&T's mass

market business product. For a count by Verizon wire center of analog voice-grade loops served by AT&T switches to All-in-One customers in Massachusetts, please see AT&T's confidential attachment JP-ATT-9A.

Additionally, customers of AT&T's Prime Path product are served at a DS0 level, but some of these customers are served on a UNE-L basis, some on a UNE-P basis, and some via a T1 with a channel bank; AT&T does not maintain records enabling it to distinguish, without a very burdensome special study, among these customers or to provide line count information for these customers on a wire center basis. As of September, 2003, AT&T provisioned *****Begin Confidential – Subject to Protective Order XXXXXXXX End Confidential – Subject to Protective Order** *** to its Prime Path customers.

b. The majority of business lines served by AT&T on a UNE-P basis are served to customers of AT&T's All-in-One product. For a count by Verizon wire center of UNE-P loops served by AT&T to All-in-One customers in Massachusetts, please see AT&T's confidential attachment JP-ATT-9B.

Additionally, as noted in response to Joint-Parties-ATT-9(a), some customers of AT&T's Prime Path product are served on a UNE-P basis, but AT&T does not maintain records enabling it, without a very burdensome special study, to provide line count information for these customers.

c. Zero. AT&T has no non-circuit switches in Massachusetts.

d. Zero. All of AT&T's residential customers in Massachusetts are served on a UNE-P basis.

e. Please see AT&T's confidential attachment JP-ATT-9C.

f. Zero. AT&T has no non-circuit switches in Massachusetts.

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JOINT PARTIES-ATT-10: For each switch your company operates in Massachusetts, please provide the information requested in TABLES 1A, 1B, and 1C. If you are unable to provide information responsive to all three tables, please provide responsive information to the extent it is available. Please do not include T-1 circuits or loops served via DS1 or above level facilities in your response.

TABLE 1A

CLEC Switch CLI	Number Of Loops Per End-User Customer Premises	Number of Local Service End-User Customers	Type of End-User Customer	Number of Voice Only End User Customers ¹	Number of DSL Only End User Customers	Number of Voice and DSL End User Customers ²
ABC	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100
	1	e.g. 5,300	Business	e.g. 5,000	e.g. 100	e.g. 100
	2		Residential			
	2		Business			
	3		Residential			
	3		Business			
	... (continue pattern as above)					
	18		Residential			
	18		Business			

	19-24		Residential			
	19-24		Business			
	one DS-1		Residential			
	one DS-1		Business			
	more than one DS-1		Business			

TABLE 1B

ILEC Wire Center	Number Of Loops Per End-User Customer Premises	Number of Local Service End-User Customers	Type of End-User Customer	Number of Voice Only End User Customers ³	Number of DSL Only End User Customers	Number of Voice and DSL End User Customers ⁴
ABC	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100
	1	e.g. 5,300	Business	e.g. 5,000	e.g. 100	e.g. 100
	2		Residential			
	2		Business			
	3		Residential			
	3		Business			
	... (continue pattern as above)					
	18		Residential			
	18		Business			
	19-24		Residential			
	19-24		Business			
	one DS-1		Residential			
	one DS-1		Business			
	more than one DS-1		Business			

TABLE IC

Mass-achusetts	Number Of Loops Per End-User Customer Premises	Number of Local Service End-User Customers	Type of End-User Customer	Number of Voice Only End User Customers ⁵	Number of DSL Only End User Customers	Number of Voice and DSL End User Customers ⁶
	1	e.g. 10,155	Residential	e.g. 10,000	e.g. 5	e.g. 100
	1	e.g. 5,300	Business	e.g. 5,000	e.g. 100	e.g. 100
	2		Residential			
	2		Business			
	3		Residential			
	3		Business			
	... (continue pattern as above)					
	18		Residential			
	18		Business			
	19-24		Residential			
	19-24		Business			
	one DS-1		Residential			
	one DS-1		Business			
	more than one DS-1		Business			

Respondent: Catherine Montfort

RESPONSE: AT&T serves no residential customers through its switches.

Please see AT&T's confidential attachment JP-ATT-10A for aggregate UNE-L and UNE-P line and customer breakdown information for customers of AT&T's All-in-One product in Massachusetts. AT&T cannot provide the additional information requested without a very burdensome special study.

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JOINT PARTIES-
ATT-11: For each switch that your company operates in Massachusetts other than circuit switches, please provide the following:

a. the date(s) on which you installed the switch and began providing local exchange service on the switch;

b. the geographic area served by the switch compared to the geographic area served by any circuit switches you use to provide local exchange service;

c. any differences in the technical or operational requirements for the customer to obtain local exchange service from the switch, including customer premises equipment or software (e.g., specialized phone set; availability of computer, cable modem, set top box, need for customer premises battery backup for telephone service), access method (e.g., DSL, cable television, satellite service), provisioning interval.

Respondent: Pamela Brander

RESPONSE: All of AT&T's switches in Massachusetts are circuit switches.

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JOINT PARTIES-
ATT-12: Do your Massachusetts intrastate tariffs limit in any way the availability of your local exchange service products to particular customer segments, either by geography, class of customer, number of lines purchased, or otherwise? If so, please describe the service offering and explain the limitation, including an explanation of the service delivery mechanism by which you offer the product (e.g., UNE-P, UNE-L, non-circuit-switched, etc.).

Respondent: Patricia Jacobs

RESPONSE: AT&T's intrastate tariffs in Massachusetts are self-explanatory.

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REQUEST: Joint Parties Information Requests to AT&T Communications of New England, Inc.

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JOINT PARTIES-
ATT-13: Please explain whether you currently have in place application-to-application, electronically integrated systems that can accomplish, on an automated, flowthrough basis (i.e. no manual intervention is required for completion of the migration), migrations between each of the following service configurations: 1) VZ voice only; 2) VZ voice plus DSL; 3) VZ DSL only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only. To the extent possible, please answer by completing the following matrix, indicating “Yes” or “No” in each box.

Respondent: Keith Snyder, Catherine Montfort

RESPONSE: (1): The systems certainly can permit automated flow-through of voice-only orders under this scenario, but the systems do not always do so. For example, if Verizon has a PLOC freeze on the account, those orders do not flow through. Moreover, an order that necessitates a hot cut necessarily requires manual intervention.

(2)–(8): These scenarios are currently not applicable to services offered by AT&T in Massachusetts.

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JOINT PARTIES-
ATT-14: Please explain whether you have always been able to obtain a customer service record (“CSR”) from Verizon and/or other CLECs for the provision of 1) local exchange voice service on UNE-P; 2) local exchange voice service on UNE loop. If not, please provide a detailed explanation of the reason(s) you did not obtain the CSR.

Respondent: Keith Snyder, Catherine Montfort

RESPONSE: These records usually can be obtained from Verizon if Verizon is providing the underlying retail service, although Verizon may require customer authorization for release. The records are not always available, however, for reasons such as Verizon’s systems being “down” or, in cases involving a parsed CSR, the account is not eligible for parsing or is too large. Verizon will not provide CSRs for customers being served by a CLEC through a UNE-L arrangement on the ground that the information is third-party proprietary data.

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JOINT PARTIES-
ATT-15: Please explain whether you currently use an electronic automated (i.e., not requiring any manual intervention prior to completion of task) method to interface with Verizon to send or receive each of the following: a) pre-order inquiries; b) orders (including placing the order, firm order confirmations, jeopardy notices, etc); c) provisioning (including the exchange of information for changes to 911, local number portability, and other databases); d) maintenance and repair; e) billing.

Respondent:

RESPONSE: AT&T is continuing to investigate to determine whether information responsive to this request is available in the form requested.

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JOINT PARTIES-
ATT-16: Please provide a detailed explanation of the electronic method (e.g. EDI, CORBA, etc.) that you currently use to send to or receive from ILECs and/or CLECs each of the following: a) pre-order inquiries; b) orders (including placing the order, firm order confirmations, jeopardy notices, etc.); c) provisioning (including the exchange of information for changes to 911, local number portability, and other databases); d) maintenance and repair; e) billing.

Respondent:

RESPONSE: AT&T is continuing to investigate to determine whether information responsive to this request is available in the form requested.

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REQUEST: Joint Parties Information Requests to AT&T Communications of New England, Inc.

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JOINT PARTIES-
ATT-17:

Please explain whether you currently have in place and use electronic automated systems to:

- a. Process orders placed by customers whose service will be provisioned using your own switches.
- b. Provision service for customers using your own switches
- c. Maintain and repair service for customers whose service is provisioned using your own switches.
- d. Conduct trouble isolation and repair for customer services provisioned via your own switches using UNE loops.
- e. Conduct testing for customer services provisioned via your own switches using UNE loops.
- f. Bill customers whose services are provisioned using your own switches.

If with respect to your answer to any of the above subparts your systems are only partially electronic, please identify specifically which portions are electronic, and which are manual, and provide a detailed explanation of the limitations created by the manual portions.

Respondent:

RESPONSE: AT&T is continuing to investigate to determine whether information responsive to this request is available in the form requested.

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REQUEST: Joint Parties Information Requests to AT&T Communications of New England, Inc.

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JOINT PARTIES-
ATT-18: Please state:

a. Whether your company has ever applied for Eligible Telecommunications Carrier ("ETC") status in Massachusetts.

b. If there answer to (a) is yes, please state whether ETC status was granted, the DTE case number in which it was granted, and the date of the order approving the status.

Respondent: Patricia Jacobs

RESPONSE: No. AT&T does, however, provide a subsidy for low-income residential customers despite the fact that it receives no reimbursement from the federal Universal Service Fund.